

DELTA PROTECTION COMMISSION

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GRAY DAVIS, Governor



June 29, 1999

Stan Martinson, Chief  
Division of Water Quality  
State Water Resources Control Board  
901 P Street  
Sacramento, CA 95814

DWQ Received  
Division Chief's Office

JUL 2 1999

Subject: Draft Environmental Impact Report Covering General Waste Discharge  
Requirements for Biosolids Land Application

Dear Mr. Martinson:

Thank you for forwarding the above-named environmental document, dated June 28, 1999. The Commission itself has not had the opportunity to review the document, so these are staff comments only. They are, however, based on the Commission's adopted regional land use plan for the Primary Zone of the Delta and adopted regulations.

The proposed General Order includes several areas of the State within which biosolids application projects cannot be permitted under the proposed General Order. This includes the "jurisdictional Sacramento-San Joaquin River Delta" (page ES-12 and Appendix A, page 10). This proposed exclusion area is consistent with the Commission's regional plan and regulations which preclude disposal of sewage effluent and sewage sludge in the Delta Primary Zone (Title 14, Section 20030 and Utilities and Infrastructure Policy P-3) due to the uniqueness of the geography, soils, and hydrology of the Delta.

2-1

The General Order should not apply in the Legal Delta, or the Primary Zone of the Delta; the language in the proposed General Order should be retained.

Thank you for forwarding the environmental document to the Delta Protection Commission for review and comment.

Sincerely,

Margit Aramburu  
Executive Director

cc: Chairman Patrick N. McCarty

## **Responses to Comments from the Delta Protection Commission**

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- 2-1. The commenter agrees with the proposed GO's exclusion of biosolids land application from the Sacramento-San Joaquin River Delta. No response is required.